

No. 3:15-cr-00037-2  
IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

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**UNITED STATES OF AMERICA,**

*Plaintiff,*

v.

**BENJAMIN BRADLEY,**

*Defendant.*

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**SUPPLEMENT TO MOTION TO MODIFY SENTENCE**

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Defendant Benjamin Bradley, through undersigned counsel, hereby submits this Supplement to his motion to modify his sentence.

Mr. Bradley had another blood pressure reading on June 15, 2020. Despite taking the blood pressure medication amlodipine at 5 mg per day for 10 days, his blood pressure was still high: 150/99. His health care provider therefore increased his daily dosage. His continued high blood pressure, combined with his severe obesity, put him at a greater risk of severe complications from COVID-19. Chao Gao et al., *Association of Hypertension and Antihypertensive Treatment with COVID-19 Mortality: A Retrospective Observational Study*, 41 Eur. Heart J. 2058 (2020), <https://academic.oup.com/eurheartj/article/41/22/2058/5851436> (finding, after controlling for confounding variables such as age, that COVID-19 patients with hypertension have about double the chance of death from the disease than patients without it). Indeed, patients like Mr. Bradley who take only non-RAAS inhibitors—such as amlodipine—for high blood pressure had similar outcomes to the average hypertensive COVID-19 patient, treated or untreated. *Id.* at 2062 tbl.3.

Also included is Exhibit A, a letter to the Court from Mr. Bradley's daughter. Her letter further evinces that the § 3553(a) factors support granting Mr. Bradley relief. As his daughter states, Mr. Bradley regrets his actions and accepts responsibility for his offense. If released, he will be highly motivated to support his children, and to avoid the risk of separation from his family.

Respectfully submitted,

/s/ Melissa M. Salinas  
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### **CERTIFICATE OF SERVICE**

I hereby certify that this Supplement was filed on June 15, 2020, using the Court's ECF system, which will send notice of this filing to all counsel of record indicated on the electronic receipt.

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